

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

JACOB AND JAMES JUNG,
ADMINISTRATORS OF ESTATE
OF LOUIS JUNG, JR,
PLAINTIFFS,

v.

CITY OF PHILADELPHIA, ET AL.
DEFENDANTS.

CIVIL ACTION:

No. 24-cv-05618-TJS

**DEFENDANT MARIESHA APOLLON'S MOTION TO DISMISS FOR
FAILURE TO STATE A CLAIM**

Defendant, Mariesha Apollon, hereby files this Motion to Dismiss for Failure to State a Claim, pursuant to Federal Rule of Civil Procedure 12(b)(6) and Motion to Strike under Federal Rule of Civil Procedure 12(f). In support of this motion, Defendant, Mariesha Apollon, incorporates the attached Memorandum of Law.

Defendant, Mariesha Apollon, respectfully requests that this Court dismiss Plaintiffs' Complaint against her with prejudice.

Respectfully submitted,

KIERNAN TREBACH, LLP

Date: May 1, 2025

/s/ Jonathan Kaminsky
Jonathan M. Kaminsky, Esq.
Sarah M. Baker, Esq.
Attorneys for Mariesha Apollon